IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

DAVID CACERES PEREZ DEBTOR(S)

CASE NUM.: 11-06808 ESL

CHAPTER 13 (ASSET CASE)

DEBTOR'S REPLY TO ASUME MOTION OBJECTING THE CONFIRMATION OF THE PLAN

TO THE HONORABLE COURT:

COMES now Debtor(s) represented by the undersigned counsel and respectfully Allege(s) and Pray(s) as follows:

- 1. The creditor ASUME objects the confirmation of the plan dated October $21^{\rm th}$, 2011, which proposes for the pre-petition arrears in favor of ASUME, the objection is made untimely after the time to object a confirmation elapsed pursuant Rule 3015 of the Bankruptcy Code.
- 2. ASUME objects the confirmation based on debtor's failure to pay his domestic support obligation post-petition for the month of October 2011.
- 3. The instant case bankruptcy petition was filed on August 2011 including pre-petition arrears up to the month of August 2011.
- 4. Debtor is current in his domestic support payment which is \$25.00 dollars weekly. Please find enclose evidence of the

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DEBTOR'S OBJECTION TO CLAIM

payments of September and October as well as the first week of November.

5. Based on the abovementioned, it is debtor's contention that ASUME's motion Objecting the Confirmation of the Plan turns into a moot one.

WHEREFORE, it is respectfully requested from this Honorable Court to GRANT the present Motion, therefore deny ASUME's Motion Objecting the Confirmation of the Plan.

In San Juan, Puerto Rico, this 1st, day of November 2011.

RESPECTFULLY SUBMITTED.

/s/ Marilyn Valdes Ortega MARILYN VALDES ORTEGA

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BANCO POPULAR

917 Dete: 10/25/2011 | Time: 11:39 am

Perede 15

Teller ID: 15

Trans. / Trans. Description / Sequence Account Number	Assunt
432 Cesh From Client	\$225.00
ASUME OCR Payment 0321535000014152205 Paid Angunt	\$25.00
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440 ASUME OCR Payment 0321535000014152205 Paid Amount	\$25.00

Este recibo es el comprobante de sus transacciones. Consérvelo para reconciliar su estado de cuenta, para alguna reclamación o devoluciones de Especiales Musicales.

- Gracias por permitirnos Servirle !





I HEREBY CERTIFY: That I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following:

11-06808-ESL13 Notice will be electronically mailed to:

JOSE RAMON CARRION MORALES newecfmail@ch13-pr.com

MONSITA LECAROZ ARRIBAS ustpregion21.hr.ecf@usdoj.gov

MARILYN VALDES ORTEGA on behalf of Debtor valdeslaw@prtc.net

I HEREBY CERTIFY: That I have mailed by regular mail to all creditors listed.

11-06808-ESL13 Notice will not be electronically mailed to:

ASUME PO BOX 70376 SAN JUAN, PR 00936

BANCO BILBAO VIZCAYA ARGENTARIA PO BOX 364745 SAN JUAN, PR 00936

CITIFINANCIAL PO BOX 71587 SAN JUAN, PR 00936

CITIFINANCIAL PO BOX 70919 CHARLOTTE, NC 28272-0919

CLARO PO BOX 71535 SAN JUAN, PR 00936-8635

DEPARTAMENTO DE HACIENDA PO BOX 9024140 OFICINA 424 B SAN JUAN, PR 00902-4140

DEPARTAMENTO DEL TRABAJO AVE MUÑOZ RIVERA 505 HATO REY, PR 00918

DEPT DE TRANSPORTACION Y OBRAS PUBLICAS CENTRO GUBERNAMENTAL MINILLAS EDIF. SUR, PISO 17 AVE. DE DIEGO SANTURCE, PR 00940 FEDERAL LITIGATION DEPT OF JUSTICE PO BOX 9020192 SAN JUAN, PR 00902-0192

FIRST BANK PO BOX 13817 SAN JUAN, PR 00908-3817

TOYOTA FINANCIAL SERVICES PO BOX 71410 SAN JUAN, PR 00936-8510